

*Evaluation Findings
for the
Washington Coastal Zone Management Program
from
December 1993 to November 1996*

April 1997



Office of Ocean and Coastal Resource Management
National Ocean Service
National Oceanic and Atmospheric Administration
United States Department of Commerce



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EXECUTIVE SUMMARY

A. OVERVIEW

Section 312 of the Coastal Zone Management Act of 1972 (CZMA), as amended, requires NOAA's Office of Ocean and Coastal Resource Management (OCRM) to conduct periodic evaluations of state coastal management program implementation. This review examined how the State of Washington has implemented and enforced the Washington Coastal Zone Management Program (WCZMP), addressed the coastal management needs in section 303(2)(A) through (K) of the CZMA, and adhered to the terms and conditions of the NOAA financial assistance awards the WCZMP received between December 1993 through November 1996.

B. ACCOMPLISHMENTS

The Evaluation Team documented a number of areas where the WCZMP improved its management of Washington's coastal resources. These include:

1. **Regionalization of Shoreline Management Act Implementation.** The Department of Ecology (Ecology) shifted the day-to-day implementation of the Shoreline Management Act (SMA) from headquarters to the regional offices in 1995. The provision of technical assistance to land owners and local governments, permitting, most site investigations, and the negotiation and drafting of enforcement orders and penalties are completed at regional level with guidance and technical assistance from headquarters. The intent to improve implementation of the SMA through a greater local presence, according to local officials, was met.
2. **CoastWeeks.** WCZMP has sponsored CoastWeeks for 10 years, and it has become the program's largest, most visible outreach effort. The WCZMP has adopted a networked approach where many agencies and organizations sponsor a variety of exciting water protection and awareness efforts taking place in local communities. For CoastWeeks '93, held between September 3 and October 4, a record 200 events attracted more than 42,000 people to learn about and help clean up coastal waters, shorelines and watersheds. In 1994 CoastWeeks was renamed WaterWeeks, and was expanded to include central and eastern Washington in a month long (September 3 through October 3) celebration that included many family-oriented and watershed education activities.

3. **Growth Management/Shoreline Management Integration.** The section 309 Growth Management Project has evolved to meet changing legislative mandates and local government needs. Initially Ecology focused this project to respond to provisions of the Growth Management Act of 1990 and 1991 amendments and the Shoreline Management Act. Even though the project emphasis has shifted, Ecology met the mandates under recent regulatory reform legislation, and still maintained the project goals: to foster consistency at the local government level between GMA-mandated comprehensive plans, development regulations and critical area ordinances, and SMA-mandated local shoreline master programs. In addition, to complement the section 309 Growth Management Project, Ecology provided section 306 planning grants to local governments to assist with the financial burden of amending local SMPs where needed for GMA/SMA consistency.
4. **Wetland Protection Activities.** During the review period the Shorelands Wetland staff developed the State Wetlands Integration Strategy (SWIS) in an attempt to develop and implement a more effective, efficient, and coordinated system to protect the wetland resources of Washington State. The strategy includes recommendations on a state wetlands policy, wetlands planning, permitting, non-regulatory actions, and education. The following is a brief list of projects which have been completed with state and federal funding (U.S. Environmental Protection Agency (EPA), U.S. Fish and Wildlife Service (USF&WS), U.S. Army Corps of Engineers (COE), U.S. Geological Survey (USGS), and NOAA).

Wetland Protection Documents

- Exploring Wetlands Stewardship - A Reference Guide for Assisting Washington Landowners, a guide and training workshop primarily funded with a Wetland Protection Development grant from EPA, and with additional funds from US F&WS and support from NOAA;
- Guidelines for Developing Freshwater Wetlands Mitigation Plans and Proposals created with funding from EPA, USF&WS and the COE;
- Washington State Wetland Function Assessment Project: An Approach to Developing Methods to Assess the Performance of Washington's Wetlands (DRAFT) funded by the EPA and coordinated through funds from the WCZMP with extensive local, State and Federal agency involvement; and,
- Local Government Needs Assessment for Wetlands Non-Regulatory Activities report, including preservation and restoration needs, was completed by the WCZMP. The assessment articulated the most common themes expressed by local governments and included their suggestions for ways to address them.

Stillaguamish Geographic Information System Project.

To support the voluntary protection of wetlands Washington piloted a Wetland Restoration Initiative in the Stillaguamish River Basin. The purpose of the project is to understand where and why wetlands occur, how they are impacted by human development, how they contribute to watershed function, and where there are opportunities for restoration. Through format and customization of GIS data sets for watershed analysis Ecology staff developed a broader understanding of surface and subsurface water movement. The analysis included the compilation and synthesis of soils, surficial geology, hydrology and land use technical data into the GIS.

5. **Section 306A Low Cost Construction Projects.** WCZMP celebrated ten (10) years of local coastal grants with a publication Managing Our Shores, Ten Years of Local Coastal Zone Management Projects in Washington State 1984 - 1994. The publication provides a brief overview of activities undertaken by local governments with WCZMP Section 306A pass-through funds. Ecology annually passes through approximately \$400,000 of their 306/306A funds directly to local governments to complete projects. Typically the awards range from \$4,000 to \$40,000.
6. **Shorelands Enforcement Manual.** Enforcing the Shoreline Management Act - Guidance for Local Government Administrators was produced and distributed to regional offices and local governments in January 1995. The manual is directed to shoreline program administrators who have enforcement responsibilities and provides enforcement techniques that are cost effective even for small communities with limited enforcement capabilities. The manual describes the enforcement process including techniques and suggestions for investigating and determining appropriate enforcement actions.
7. **Watershed Planning.** The Department of Ecology working with other state agencies and local communities, has developed Local Action Teams in specific watershed to strengthen partnerships with citizens, businesses and local governments. Local Action Teams may have a full time team leader and staff (Nooksack), a full time leader with part-time staff (Snohomish), or a part-time leader and staff (Willapa). The teams work cooperatively with local, State and Federal agencies to set priorities for the watershed. The teams emphasize building cooperative relations and increasing voluntary environmental stewardship within the communities they serve.
8. **Technical Assistance.** A hallmark of WCZMP implementation is the high quality of technical assistance activities ranging from providing training for

regional permit reviewers to developing technical reports for local governments. During the review period, significant activities included co-sponsoring a 3-day Spring Planning Conference with the American Planning Association of Washington in 1994; preparing a slide presentation - Integrating Shoreline Goals with Growth Management Planning; and completing a comprehensive report on shoreline erosion in Puget Sound.

9. **Improvements in Shorelines Hearings Board Processes.** During this review period, the Shorelines Hearings Board has made significant improvements in its processes. These include: the use of three members to hear and decide shoreline permit appeals involving a single family residence; the addition of two part-time administrative appeals judges; the creation of a mediation program; and a legislative requirement that the Board render its decisions within six months of the date an appeal is filed, unless the parties waive the requirement, or the Board extends the period for 30 days for good cause.
10. **Routine Program Changes.** During the review period Ecology responded to a necessary action of the previous evaluation and submitted eighty (80) local shoreline master plan changes to OCRM. Since shoreline master program changes must be approved by the Ecology and submitted to OCRM as individual program changes, the administrative requirements to eliminate the backlog and remain current with the changes occurring during the review period was considerable. Eliminating the backlog is a significant achievement.

C. SUMMARY OF RECOMMENDATIONS

In addition to the significant accomplishments described above, OCRM has identified areas where the program may be improved. These evaluation findings contain three (3) recommendations which take the form of a Necessary Action and are mandatory. Seven (7) recommendations take the form of Program Suggestions and are not mandatory at this time. However, Program Suggestions that must be reiterated on consecutive evaluations to address continuing problems may be elevated to Necessary Actions.

1. **NECESSARY ACTION: Federal Consistency.** Within four (4) months of the receipt of these final findings, Washington will inform OCRM of how it will address the new public notice requirements at 306(d)(14) of the CZMA, consistent with NOAA's guidance.
2. **NECESSARY ACTION: Program Document.** Ecology will submit a final draft document of the revised WCZMP for OCRM review and comment by the

end of calendar year 1997.

3. **NECESSARY ACTION: Permit Enforcement and Monitoring.** Ecology must develop a compliance and enforcement strategy to assure that the WCZMP is being implemented in such a way that the policies of the CZMA are being met. The strategy will be completed by December 31, 1998. In the interim, Ecology will include summaries of compliance and enforcement activities in their routine semi-annual reports.
4. **PROGRAM SUGGESTION. Shoreline Management Act/Growth Management Act Integration.** Ecology should complete the revisions to the SMA rules and assure that integration of the SMA achieves improvements to the local shoreline master plans.
5. **PROGRAM SUGGESTION. Bulkheading of Single Family Lots in Puget Sound.** The WCZMP should continue to address the cumulative impacts of hardened shorelines in Puget Sound. More specific management policies and technical assistance documents which address these impacts should be considered.
6. **PROGRAM SUGGESTION. Pacific Coast Shoreline Erosion.** Ecology is encouraged to complete the Southwest Coastal Erosion study with the USGS. In addition, Ecology should work with OCRM to look for ways to improve the management decisions in the southern Washington shoreline area. Likewise, OCRM should work with Ecology to define needs for improved federal agency coordination in support of the needs of the local communities affected by erosion along the southwest Washington coast.
7. **PROGRAM SUGGESTION. Updating of the Grays Harbor Estuary Management Plan.** While revisitation and assessment of the effectiveness of the implementation of the Grays Harbor Estuary Management Plan is encouraged, a lengthy planning process, and its resultant costs, should be avoided.
8. **PROGRAM SUGGESTION. Training of Public Officials.** Ecology should provide technical assistance for locally elected officials which provides the rationale and support for the implementation of local management programs and the SMA.
9. **PROGRAM SUGGESTION. Shorelands/Coastal Management Program Identity.** Ecology should consider ways for all Shorelands staff, in order to improve communication and devise a means to ensure coordination of information and approaches among Shorelands regional and headquarter staff. This could include an annual or biannual one to two day workshop involving

relevant staff from other State agencies. The workshop should result in a means to foster follow-up communication throughout the remainder of the year.

10. **PROGRAM SUGGESTION. Documentation of Shorelands Program Accomplishments.** Ecology should consider developing various means of documenting the overall accomplishments of WCZMP implementation over the recent past, how the State has benefited from the program, and the economic advantages accruing from the wise management practices carried out to implement WCZMP policies and goals. Alternative means could be enhancing existing documents such as the "Confluence" newsletter of a separate annual report.

I. INTRODUCTION

Section 312 of the Coastal Zone Management Act (CZMA) of 1972, as amended, requires NOAA's Office of Ocean and Coastal Resource Management (OCRM) to conduct a continuing review of the performance of States and Territories with Federally approved Coastal Management Programs. This document sets forth the evaluation findings of the Director of OCRM with respect to the Washington Coastal Zone Management Program (WCZMP) for the period from December 1993 through November 1996. This document includes an Executive Summary, Program Review Procedures, Program Description, Accomplishments, Review Findings and Recommendations, and a Conclusion.

The recommendations made by this evaluation appear in **bold** type and follow the section of the findings in which the facts relative to the recommendation are discussed. The recommendations may be of two types:

(1) **Necessary Actions** address programmatic requirements of the CZMA regulations and of the WCZMP approved by NOAA, and must be carried out by the date(s) specified. There are three (3) Necessary Actions within this document.

(2) **Program Suggestions** denote actions which OCRM believes would improve the management and operations of the Program, but are not yet mandatory. Program Suggestions that must be reiterated in consecutive evaluations to address continuing problems may be elevated to Necessary Actions. There are seven (7) Program Suggestions within this document.

If no specific dates are given for carrying out a Program Suggestion or a Necessary Action, the State is expected to have successfully implemented the Necessary Action or Program Suggestion by the time of the next section 312 evaluation. The findings contained within this document will be considered by NOAA in making future financial assistance award decisions relative to the Washington Coastal Zone Management Program.

II. PROGRAM REVIEW PROCEDURES

The Office of Ocean and Coastal Resource Management (OCRM) evaluation staff began review of the Washington Coastal Zone Management Program (WCZMP) in August 1996. This included an analysis of the approved WCZMP, previous and current award documents and performance reports, previous evaluation findings, correspondence relating to the WCZMP, and other relevant information. The Policy Coordination Division (PCD) and the Coastal Programs Division (CPD) staff coordinated to determine the issues which would become the main focus of the evaluation. The Evaluation Team analyzed the State's responses to these specific issues and used them as primary sources of information on the WCZMP's operation.

The Evaluation Team gave special emphasis to the following issues:

- * The effectiveness of the State's implementation of the Shorelands program and WCZMP core authorities;
- * The effectiveness of the Shorelands Monitoring and Enforcement efforts;
- * The effectiveness of the WCZMP's use of the Federal consistency process as a management tool;
- * The integration of the Shoreline Management and Growth Management Acts;
- * The impact, if any, of the merging of the Shorelands and Water Resources Programs on Headquarters and the regional offices;
- * The interaction between Headquarters and the regional offices and between the regional offices, including support, training and assurance of consistency of information transfer;
- * Status of budget documentation;
- * Status of the update of the program document and the local plans;
- * Improvements in opportunities for public access to the coast;
- * Opportunities for public participation, both formal and informal, in permitting and other decisions under WCZMP; and,

- * Review of any program changes to and the impact of these changes on the WCZMP.

John H. McLeod, Evaluation Team Leader, PCD; Bill Millhouser, Pacific Regional Manager, CPD; Masi Okasaki, Program Specialist, CPD; and, Steve Goldbeck of the California, San Francisco Bay Conservation and Development Commission conducted a site visit from November 18 through 22, 1996. The Evaluation Site Visit Team met with representatives of State, local and, Federal agencies; interest groups; and private citizens during the site visit. A public meeting was held on November 21, 1996, at 7:00 pm, at the Department of Ecology, 300 Desmond Drive, Olympia, WA.

Prior to the site visit, the Evaluation staff provided written notice of the WCZMP evaluation to relevant Federal agencies and provided opportunities for them to respond. (**Appendix A** lists persons contacted in connection with the evaluation; **Appendix B** lists persons who attended the Public Meeting; **Appendix C** contains NOAA's response to written comments received.)

The WCZMP staff were instrumental in setting up meetings and arranging logistics for the evaluation site visit. Their support is gratefully acknowledged.

III. PROGRAM DESCRIPTION

In June, 1976, Washington received NOAA approval of its coastal management program, the first state to receive such approval. The Washington Coastal Zone Management Program (WCZMP) is based primarily on the State's Shoreline Management Act (SMA), enacted in 1971, and the State Environmental Policy Act (SEPA), also enacted in 1971. Other authorities related to water and air pollution control are also incorporated, as are two Executive Orders relating to wetlands protection.

The WCZMP designated the Department of Ecology (Ecology), Shorelands Program as the lead coastal management agency, and as the entity that would conduct federal consistency reviews. In 1995, the Shorelands Program merged with the Water Resources Program and many of the Shoreline Management Act implementation activities were shifted to the Northwest and Southwest Regional Offices. Other agencies participate in program implementation, include the Departments of Natural Resources, Fish and Wildlife, Transportation, and Parks and Recreation.

Washington's coastal zone boundary is composed of the 15 coastal counties that front on salt water. The Shoreline Management Act applies to the shorelines of the State which includes all marine waters, all lakes twenty acres and larger, all streams and rivers with a mean annual flow of twenty cubic feet per second or more, land areas within 200 feet of the waters, and associated wetlands.

The SMA requires that land and water uses meet certain criteria as follows:

- Recognition and protection of Statewide interest over local interest;
- Preservation of the natural character of the shoreline;
- Promotion of long term benefit over short term gain;
- Protection of the resources and ecology of the shoreline;
- Increasing public access to publicly owned areas of the shoreline; and,
- Increasing recreational opportunities of the public on the shoreline.

The Washington program is based on local implementation. Local governments develop Shoreline Master Plans (SMPs) based on the SMA with Ecology guidance and assistance. Once a local SMP is approved, Ecology provides continuing policy direction and oversight for local shoreline administrators, who are responsible for integrating SMA policies into local land use management and permitting decisions, and for enforcement.

Fifteen (15) counties and 100 local jurisdictions within the coastal zone have developed, adopted, and received approval of their SMP from Ecology and NOAA. These 115 jurisdictions have the authority under the SMA to issue or deny substantial development permits for activities. Local government recommendations for conditional uses and for variances from their SMP,

however, must be submitted to Ecology for approval. The SMA also provides an appeals process. Any person aggrieved by the granting, denying, or rescinding of any local government shoreline permit may appeal that decision to the Shorelines Hearings Board (SHB), a quasi-judicial body. Local permitting decisions and Ecology decisions on conditional use permits and variances, for example, are subject to SHB appeal.

In addition to these formal regulatory and oversight responsibilities, the WCZMP calls for Ecology to play an active support role for local governments and engage in public education and outreach activities.

IV. PROGRAM ACCOMPLISHMENTS

Implementation of the Washington Coastal Zone Management Program has resulted in three (3) years of growth in program implementation since OCRM's last evaluation of the WCZMP. The performance period was a challenging time in the history of WCZMP implementation, which was required to respond, along with all of State government, to a number of State budget cuts, State government downsizing, a growth of the property rights movement, and legislative challenge. Despite these challenging circumstances implementation of the WCZMP made progress and evidenced a number of successes. While in part attributable to past and present management, and directly attributable to the personal motivation of the individual staff, the personnel resources of Ecology drives the accomplishments listed below. It is through staff commitment and motivation to the WCZMP and the State of Washington that the following accomplishments are listed.

A) Regionalization of Shoreline Management Act Implementation.

The Department of Ecology (Ecology) shifted the day-to-day implementation of the Shoreline Management Act (SMA) from headquarters to the regional offices in 1995. Regional staff now provide technical assistance to land owners and local governments, review permits, conduct site investigations, and negotiate and draft enforcement orders and penalties. The goal of regionalization was to improve implementation of the SMA through a greater local presence and, according to local officials contacted during the evaluation, the goal is being met.

Headquarters staff provide training to Ecology staff in the regions, as well as to other Ecology programs, and other State and Federal agencies. Headquarters staff also develop policies and procedures to maintain appropriate Statewide consistency in program implementation, and review and analyze proposed legislation. The new guidebook for local government officials Enforcing the Shoreline Management Act, discussed below, is an important tool for insuring a consistent approach to shoreline enforcement at the local and regional levels. It is the first clear, concise "how-to" manual for local government on shoreline enforcement.

B) CoastWeeks.

WCZMP has sponsored CoastWeeks for 10 years, and it has become the program's largest, most visible outreach effort. The WCZMP has adopted a networked approach where many agencies sponsor a variety of exciting water protection and awareness efforts in local communities. A year round contractor coordinates the CoastWeeks effort, organizing all local events, preparing all program material (including the graphically coordinated Journal and poster) and conducting a thorough evaluation of the event proceedings. The contractor also solicits

corporate contributions. For CoastWeeks '93, held between September 3 and October 4, a record 200 events attracted more than 42,000 people to learn about and help clean up coastal waters, shorelines and watersheds. To market the CoastWeeks '93 activities, \$20,000 in private contributions paid for the printing of 100,000 copies of CoastWeeks Journal of Events, 1,000 posters, banners, and other promotional items. In addition to monetary contributions, businesses assisted in marketing CoastWeeks. One bank sponsor distributed Journals through its 120 bank branches.

In 1994 the CoastWeeks was renamed WaterWeeks, and was extended to include central and eastern Washington in a month long (September 3 through October 3) celebration that included many family-oriented and watershed education activities. WaterWeeks '94 logged more than 220 local activities attended by over 49,000 people. For WaterWeeks '94, program marketing approaches included 100,000 Journals, 2,000 posters, mass media mailings, and free public service announcements run over the State's largest cable carrier. The \$20,000 WCZMP grant yielded a match of \$7,500 from the State Department of Natural Resources, \$3,500 in special mini-grants to innovative local events from the Puget Sound Water Quality Authority, a total of \$27,000 cash from corporate sponsors, and several thousand dollars in-kind contribution from EPA in mailing and printing costs. The WaterWeeks '95 and '96 programs met with similar and increasing success.

C) Growth Management/Shoreline Management Integration

The section 309 Growth Management Project has evolved to meet changing legislative mandates and local government needs. Initially Ecology focused this project to respond to provisions of the Growth Management Act of 1990 and 1991 amendments and the Shoreline Management Act. Even though the project emphasis has shifted, Ecology met the mandates under the regulatory reform legislation, and still maintained the project goals: to foster consistency at the local government level between GMA-mandated comprehensive plans and ordinances, and SMA-mandated local shoreline master programs. In addition, to complement the section 309 Growth Management Project, Ecology provided section 306 planning grants to local governments to assist with the financial burden of amending local SMPs where needed for GMA/SMA consistency.

With the passage of the Growth Management Act, numerous questions were raised on how the statute would relate to the WCZMP's existing authorities, the Shoreline Management Act and the State Environmental Policy Act (SEPA). Although Ecology cannot require local governments to update or otherwise improve shoreline master plans, Ecology recognized a critical opportunity to improve local shoreline master plans when the GMA required local governments to conduct extensive reviews of natural resource bases, land uses, priority areas, and other elements of land management. Even though the Department of Community Development has the primary responsibility for GMA implementation, Ecology moved aggressively to meet local governments' need for information and expertise, reasoning that providing such assistance

to local governments might result in improvements to local shoreline master plans. Counties and cities were required to have their comprehensive plans adopted by July 1, 1993 with development regulations to implement the comprehensive plans scheduled to be completed by December 1994.

During the section 309 Growth Management Project, Ecology focused on several key elements:

- development of internal policy, standards, and guidelines for staff review of GMA mandated comprehensive plans, development regulations, and critical areas ordinances;
- inter- and intra-agency coordination on GMA-SMA consistency, especially between the Department of Ecology and the Department of Community, Trade, and Economic Development;
- development of model shoreline and coastal zone policies;
- delivery of technical assistance, primarily to local governments and secondarily to other state agencies and the public; and,
- review and comment on GMA-mandated local comprehensive plans, development regulations, and critical area ordinances.

In 1995, the Washington State legislature adopted seven different bills amending the SMA as part of a broad regulatory reform effort aimed at achieving better integration of GMA, SMA and SEPA as well as providing procedural remedies for various aspects of the SMA. While not changing the broad goals of the SMA, this legislation required amending all the rules for implementation of the SMA. Accordingly, the emphasis of this project shifted to amend the SMA implementing regulations.

Ecology amended and consolidated the existing procedural rules for implementation of the SMA into a single rule covering general administration and procedures at both the state and local level for adoption and amendment of local shoreline master programs. Also the SMA implementing rules for permit application processing and enforcement procedures were amended and consolidated into a single new rule. The SMP Approval, and Amendment Procedures rule (WAC 173-26) and the Shoreline Management Permit and Enforcement rule (WAC 173-27) were adopted on September 26, 1996 and went into effect October 31, 1996.

The second draft of Chapter 173-26 WAC, Shoreline Master Program (SMP) Guidelines is out for public comment until January 31, 1997. This is a rewrite of the shoreline master program guidelines rule to integrate legislative amendments to the SMA from recent years, Shoreline Hearings Board and case law decisions, and recent policy interpretations. The

Shoreline Master Program Guidelines rule will initially be a pilot rule which greatly facilitates 'fine tuning' during the early years of implementation. Ecology anticipates the adoption of new 'pilot' Guidelines rule by mid-1997.

Ecology staff is currently amending Chapter 173-22, Adoption of Designations of Wetlands Associated with Shorelines of the State to adopt a new rule, a wetlands delineation manual which is consistent with the U.S. Corps of Engineers 1987 wetlands delineation manual. This rule is anticipated to be adopted in March 1997.

D) Wetland Protection Activities

During the review period the Shorelands Wetland staff developed the State Wetlands Integration Strategy (SWIS) in attempt to develop and implement a more effective, efficient, and coordinated system to protect the wetland resources of Washington State. The strategy includes recommendations on a state wetlands policy, wetlands planning, permitting, non-regulatory actions, and education.

Washington State's policy of no-net-loss of wetlands places a high value on wetlands protection and numerous legislative mandates address wetlands protection from a regulatory perspective. The Growth Management Act directs local governments to identify and protect critical areas such as wetlands. However, it is recognized that regulations alone will not adequately protect wetlands from ongoing loss and degradation. Voluntary, non-regulatory approaches to wetland protection play a key role in complementing regulatory efforts to achieve no-net-loss goals.

The following is a brief list of wetlands projects Ecology completed with state and federal funding (U.S. Environmental Protection Agency (EPA), U.S. Fish and Wildlife Service (USF&WS), U.S. Army Corps of Engineers (COE), U.S. Geological Survey (USGS), and NOAA).

1. Wetland Protection Documents

a. Exploring Wetlands Stewardship.

Exploring Wetlands Stewardship - A Reference Guide for Assisting Washington Landowners, is designed for use by the technical assistance community (field staff of natural resource agencies, conservation districts, cooperative extension agents, local governments, land trusts and other organizations) who work directly with Washington landowners. The guide provides technical and financial information about voluntary protection measures for wetlands (preservation, restoration, or

conservation) and includes information on stewardship techniques, contacts for getting help, and a user-friendly directory of assistance programs. The directory is accessible on the World Wide Web at <http://www.wa.gov/ecology/> and the guidebook is available for photocopy and distribution by any user. The guide and materials were primarily funded with a Wetland Protection Development grant from the EPA, and with additional funds from the USF&WS and support from NOAA.

b. Guidelines for Developing Freshwater Wetlands Mitigation Plans and Proposals.

Funding from the EPA, USF&WS and the COE was used in the creation of Guidelines for Developing Freshwater Wetlands Mitigation Plans and Proposals. The document provides guidance for those planning to restore, create, or enhance freshwater wetlands as part of a mitigation program to compensate for unavoidable impacts to existing freshwater wetlands. Federal agencies, in cooperation with the Washington State Department of Ecology, Washington State Department of Fisheries and Washington State Department of Wildlife collaborated to improve and facilitate the permit process. Developing one document outlining recommendations for mitigation plans increased the coordination between the agencies and reduced confusion on the part of applicants.

c. Washington State Wetland Function Assessment Project: An Approach to Developing Methods to Assess the Performance of Washington's Wetlands (DRAFT)

The Washington State Wetland Function Assessment Project: An Approach to Developing Methods to Assess the Performance of Washington's Wetlands (DRAFT) is a Statewide effort to develop relatively rapid, scientifically valid methods of assessing how well wetlands provide certain functions such as improving water quality, reducing floods, and providing wildlife habitat. The methods are developed for different wetland types within the State. The project is being funded by the EPA and coordinated through funds from the WCZMP with extensive local, State and Federal agencies involvement.

d. Local Government Needs Assessment for Wetlands Non-Regulatory Activities.

In order to support local initiatives, WCZMP completed A Local Government Needs Assessment for Wetlands Non-Regulatory Activities report, which includes a section on preservation and restoration needs. The report articulates the most common themes expressed by local governments and includes suggestions to

address them. Categories include documenting the economic advantages of wetlands, addressing assessment and management of wetlands in a wetland context, improving agency leadership and increasing agency technical assistance.

2. Stillaguamish Geographic Information System Project.

To support the voluntary protection of wetland acreage, Washington piloted a Wetland Restoration Initiative in the Stillaguamish River Basin. The purpose of the project is to understand where and why wetlands occur, how they are impacted by human development, how they contribute to watersheds function, and where there are opportunities for restoration. Through format and customization of GIS data sets for watershed analysis applications Ecology staff developed a broader understanding of surface and subsurface water movement. This analysis included the compilation and synthesis of soils, surfacial geology, hydrology and land use technical data into the GIS.

E) Section 306A Low Cost Construction Projects.

The WCZMP celebrated ten (10) years of local coastal grants with a publication Managing Our Shores Ten Years of Local Coastal Zone Management Projects in Washington State 1984 - 1994. The publication provides a brief overview of activities undertaken by local governments with WCZMP pass-through funds. During the site visit two specific sites were visited by the evaluation team:

1. The City of Raymond has used section 306A funds and the other state and federal funding sources to bring in over \$2.5 million to the City with an approximate investment of \$50,000 in municipal funds. Past 306A projects include portions of a municipal dock and pier. As a result of this effort a private nautical museum has relocated to Raymond's waterfront and will open its doors to the public next year. A current section 306A award will provide restroom facilities and a marine interpretive center near the pier area.
2. The Town of Steilacoom rehabilitated two waterside parks at both ends of the town's waterfront. Both parks are located seaward of the rail tracks which run the length of the waterfront and effectively limit access for the remainder of the Town. The Sunny Side Park at the Town's easternmost end provides pedestrian access to one of the few public beaches in Puget Sound. WCZMP funds have been used for park planning and beach front restoration projects. Notable at Sunny Side park was a pilot project on beach protection without the use of traditional bulkheads.

Including 306A funds, Ecology passes through approximately \$400,000 of Washington's coastal management funds directly to local governments to complete such projects as: training volunteers for Beach Watcher programs; studying the potential use of road ends for public access; completing SMA/GMA shoreline master program amendments; and, developing master

plans for trail systems. Typically the awards range from \$4,000 to \$40,000. Ecology requires the recipient to provide at least a 50% match for these awards. Table I and Table II list the 1995 and 1996 local projects that were awarded funding.

Table I 1995 Local Government Grants

Recipient	Project
City of Bellingham	Develop a master plan for Squalicum Creek Greenway for trails for, among other things, public access.
Clallam County	Phase II providing options for conservation easements, improved public benefit, and greenway plan.
Clallam County	Acquire Mary Lukes Wheeler Park, and develop the property as park.
City of Everett	Snohomish Pier sediment transport report, analyst of sedimentation on port properties, beneficial use of dredged materials drafts.
Grays Harbor Co.	Barrier free, pedestrian asphalt interpretive pathway along southeast Friends Lake
Island County	Beach monitoring (Beachwatchers Program), training retreat and Water Festival.
City of Lake Forest Park	Adoption of Shoreline Management Plan
Mason County	Comprehensive shoreline inventory maps identifying shoreline features.
Met. Park District of Tacoma	Engineering study of Titlow Park boat launch site.
Pacific County	Production of Long Beach peninsula aerial photos and shoreline permit processing.
City of Port Townsend	Shoreline ecology and management educational beach walks.
City of Raymond	Demolition, removal and disposal of unstable pier and driving of new pilings.
San Juan County	Shoreline Master Plan work products.
City of Sequim	New SMP for recently annexed waterfront.
City of Steilacoom	Beach restoration using natural methods.
City of Sultan	Instillation of handicap accessible prefab. bridge over Sultan Slough and trails to Sultan River

Table II 1996 Grants to Local Governments

Recipient	Project
City of Aberdeen	Waterfront Walkway - Wishkah mall Shoreline Segment
City of Bainbridge Island	Increased public access to public shorelines (Phase I)
Clallam County	Acquired Mary Lukes Wheeler Park, and developed the property as park.
City of Edmonds	SMA/GMA SMP Amendment (continued from 1995)
Town of LaConner	Construction of public facilities (restrooms)
City of Lynden	SMP draft comprehensive plan rewrite
Mason County	SMP Amendment for SMA/GMA Integration
City of Oak Harbor	Hydrological study and wetland restoration master plan for "The Freund Marsh."
City of Ocean Shores	Wetland Inventory
City of Olympia	Planning for Budd Inlet Historic Shoreline Trail/ East Bay revitalization
City of Raymond	Willapa Marine Interpretive Center building renovation.
San Juan County	Development of the Unified Development Code (SMA/GMA integration).
City of Skykomish	Environmental Issues analysis.
Snohomish County	Planning for the construction of a public wetlands education park (related to airport).
Town of South Prairie	SMP draft development
Town of Steilacoom	Master plan for Slater's Point Beach Park.
Wahkaikum Port District II	Vista Park Barrier-free shoreline trail.
Whatcom County	GIS mapping and GMA integration.

F) Shorelands Enforcement Manual.

Enforcing the Shoreline Management Act - Guidance for Local Government Administrators was produced and distributed to regional offices and local governments in January, 1995. The manual is directed to shoreline program administrators who have enforcement responsibilities and provides enforcement techniques that are cost effective even for small communities with limited enforcement capabilities. The manual describes the enforcement process including techniques and suggestions for investigating and determining appropriate enforcement action.

Intended as a complement to the 1994 Shoreline Management Handbook, the Enforcement Manual contains detailed “how to” information specific to shoreline enforcement and is a useful guide for training inspectors, code enforcement staff, or other personnel involved in shoreline complaints or enforcement. It is organized according to the steps an administrator would typically follow once a complaint or potential violation is reported. The guide provides practical information and “how to” techniques and procedures, including tips, reminders and checklists for each of the steps. Each chapter is supplemented by a section providing suggestions for improving the overall effectiveness of local shoreline enforcement programs. Manual topics include: learning about violations via complaints and inspections; effective investigation techniques, including pre-planning, initial contact and interviewing, documentation, photography and reporting; coordinating enforcement efforts with agencies; evaluating the seriousness of a shoreline violation under the SMA; determining the most appropriate compliance strategy; legal tools and procedural options including voluntary complaint; issues to consider if cases are appealed or litigated; and, legal, administrative and technical support available from the Department of Ecology. Local government officials interviewed during the evaluation site visit praised the practicality and utility of the manual.

G) Watershed Planning.

The Department of Ecology working with other state agencies and local communities, has developed Local Action Teams in specific watershed to strengthen partnerships with citizens, businesses and local governments. Local Action Teams may have a full time team leader and staff (Nooksack), a full time leader with part-time staff (Snohomish and Chehalis), or a part-time leader and staff (Willapa). The teams work cooperatively with local, State and Federal agencies to set priorities for the watershed. The teams emphasize building cooperative relations and increasing voluntary environmental stewardship within the communities they serve.

Local Action Teams work in identified communities in response to cross-program and complicated or contentious issues within a geographic area. Future Local Action Teams will be formed when the Regional Management Team nominates an area to the Executive Management Team (EMT). If the EMT approves the area, they will select a team leader and charge them with developing a local profile. Once the local profile is developed a decision will be made regarding whether to create a Local Action Team or take some other course of action.

H) Technical Assistance.

A hallmark of WCZMP implementation is the high quality of technical assistance activities ranging from providing training for regional permit reviewers to develop technical reports for local governments. During the review period, significant activities included:

1. Technical Workshops.

In 1994, the WCZMP co-sponsored a 3 day Spring Planning Conference with the American Planning Association of Washington. The WCZMP sponsored three major workshops at the conference: Enforcement; Nuts and Bolts of Shoreline Management; and, Integrating SMA (Shoreline Management Act), GMA (Growth Management Act) and SEPA (State Environmental Protection Act). At other times during the review period, WCZMP sponsored a number of technical workshops on wetlands functions and values, basic wetlands training, implementation of the wetland rating system, and monitoring and enforcement. "Discover WILD Wetlands" teacher workshops were held on a number of occasions to standing room only audiences. Also a teacher workshop on nature poetry writing was held to a standing room only participants. A Bioengineering Workshop held at Padilla Bay drew 62 participants to a room designed for 40 people.

2. Growth Management.

A number of activities were directed toward growth management including: a slide presentation - Integrating Shoreline Goals with Growth Management Planning to assist locals in integrating coastal cumulative impact concerns related to growth into local comprehensive plans; a technical paper Coordinating Wetlands Requirements Under the Shoreline Management Act and the Growth Management Act which discusses the respective roles of critical areas ordinances and the shoreline master program in regulating wetlands; and, A Mini-Guidebook on the Shoreline Management Act, an 18 page summary of the Shoreline Management Guidebook. Ecology also assisted the Growth Management Team with developing a geologic hazard primer for regional office staff and made presentations at headquarters and regional staff meetings.

3. Puget Sound Shoreline Erosion Guide Booklets.

Ecology completed Surface Water and Groundwater on Coastal Bluffs: A Guide for Puget Sound Property Owners in June 1995. This booklet provides coastal property owners with general information concerning the management of water on coastal slopes. The publication introduces the relationships between coastal geology, water, and slope stability. It also provides criteria for evaluating site drainage control techniques. This is the third in a series of booklets focusing on slope management practices for Puget Sound. The others, Slope Stabilization and Erosion Control Vegetation: A Manual of Practice for Coastal Property Owners and Vegetation Management: A Guide for Puget Sound Bluff Property Owners were published in May 1993. These publications were requested more often than any other Ecology publication in 1996.

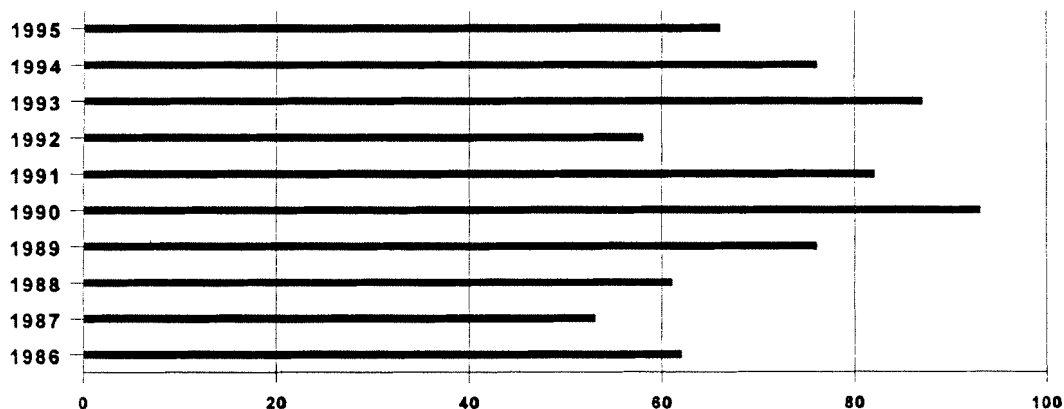
I) Improvements in Shorelines Hearings Board Processes.

During this review period, the Shorelines Hearings Board made significant improvements in its processes. These include: the use of three members to hear and decide shoreline permit appeals involving a single family residence; the addition of two part-time administrative appeals judges; the creation of a mediation program; and a legislative requirement that the Board render its decisions within six months of the date an appeal is filed, unless the parties waive the requirement or the Board extends the period for 30 days for good cause.

The success of these measures is demonstrated by the fact that the average time to resolve appeals has been reduced from 13 months in April 1994 to 7¼ months. Moreover, the Board has been able to resolve numerous matters through mediation, without protracted hearings. In addition, the Administrative Procedure Act was amended to allow significant decisions emanating from the Shorelines Hearings Board, the other Boards comprising the Environmental Hearings Office, and the Growth Planning Hearings Boards, to be directly reviewed by the appropriate Court of Appeals. Although this last measure has not yet been tested in a shoreline appeal, it has the potential to reduce considerable time and expense to parties involved in the appeal of significant cases.

During the review period, hearings before the Board remained relatively consistent with past years (See Chart 1. Total Cases Heard by the Shorelines Hearings Board). Of those cases, "takings" cases predominated during 1994, but, these have significantly declined.

Chart 1. Total Cases Heard by the Shorelines Hearings Board.



J. Routine Program Changes.

During the review period Ecology responded to a necessary action of the previous evaluation and updated its submissions of program changes. That evaluation stated that:

“Within two years, Shorelands must have submitted all of the backlogged SMP amendments to OCRM for consideration as program changes.”

At that time eighty (80) local shoreline master program changes were pending. All have been submitted during the review period. Since shoreline master program changes must be approved by the Ecology and submitted to OCRM as individual program changes, the administrative requirements to eliminate the backlog and remain current with the changes occurring during the review period was considerable. Eliminating the backlog is a significant achievement.

V. REVIEW FINDINGS AND RECOMMENDATIONS

The Office of Ocean and Coastal Resource Management (OCRM) finds that the WCZMP is adhering to its approved coastal management program; implementing and enforcing the WCZMP in a satisfactory manner; and adhering to the programmatic terms of the NOAA financial assistance awards. The State continues to address national coastal management needs identified in CZMA Section 303 (2) (A) through (K). The previous evaluation of Washington's performance in implementing the WCZMP resulted in two (2) necessary action recommendations, and six (6) program suggestions. The State met, or is meeting these recommendations. (See Appendix D for a discussion of each finding, recommendation, and response, and for reference to the response within this document where appropriate.) Discussed below are findings of fact about ongoing WCZMP management and administration, issue identification and findings with recommendations.

A. Watershed Management.

Ecology has begun to mobilize and deliver services on a watershed approach where a watershed is targeted and a team is mobilized to address a wide range of issues. The use of Local Action Teams (see Program Accomplishments, at H. Watershed Projects Local Action Teams) indicates the commitment to bringing Departmental technical assistance to the local level. There was also a move to carry out permitting, monitoring and enforcement functions under the same team approach. However, in practice these functions have not been fully integrated into Local Action Teams. To do so would create disparities in case loads within regional offices and administration may extend beyond a regional office boundary to that of another regional office. While a watershed approach appears to be a good technique for addressing resource management issues, it appears to not be as efficient a mechanism for permit administration and management.

B. Padilla Bay National Estuarine Research Reserve Activities.

The Padilla Bay National Estuarine Research Reserve (PBNERR) and the WCZMP work closely together and mutually support one another. Ecology administers the Padilla Bay Research Assistantships which has resulted in a number of scientific papers:

"A Comparison of Bacterial Numbers, Biomass, and Heterotrophic Activity in the Sea-surface Microlayer in Padilla Bay." Preliminary results indicate a much higher biomass of bacteria in the surface layer compared to bulk water.

"Current and Flow Studies in the Swinomish and Guemes Channels." Indicates that

Swinomish Channel water flows primarily out Guemes Channel and mixes with Padilla Bay water only during a limited part of the tidal cycle.

“Analysis of Policies and Management Practices of Washington State Agencies as they Pertain to the Eelgrasses *Zostera Japonica* and *Zostera Marina*.”

“Temporal, Diel, and Vertical Variation of Epiphyte Grazers in a Temperate Eelgrass System.”

“Comparative Ecology of Bacterioneuston and Bacterioplankton in Padilla Bay.”

“The Establishment of *Zostera marina* and *Zostera Japonica* Seagrasses Along Their Transitional Boundary in Padilla Bay.”

“The Decomposition of Eelgrass in a Northern Temperate Seagrass Bed.”

“Feeding Chronology of Shiner Perch and Their Role as Predators on Caprellid Amphipods in an Eelgrass Meadow in Padilla Bay.”

In addition, they share a joint project to create a demonstration farm (Peth Farm) in PBNERR to study methods of nonpoint pollution remediation. The Peth Farm was purchased by the PBNERR in 1993 and consists of about 100 acres of farmland and various agricultural buildings located adjacent to the bay-front dikes separating Padilla Bay from farmlands to the south. Local farmers, resource managers, agency regulatory staff and agricultural researchers were brought together to develop and investigate measures to control sediment, nutrient and pesticide movement from farmland to adjacent coastal habitats. Since July of 1995, staff have conducted weekly monitoring of the farm's major internal drainage slough (No-name Slough) for nutrient content and suspended sediments.

A steering committee was formed to assist staff in the development of the initial operational plan for the demonstration farm. Representatives from production agriculture, agricultural research, environmental and conservation groups and PBNERR participate on the committee. The Steering committee developed a mission statement for the farm and the group. The mission statements seeks to minimize nonpoint pollution impacts to Padilla Bay, its watershed and Puget Sound through research, education and demonstration projects which evaluate the effectiveness of agricultural BMPs and new innovative techniques; encourage public participation and education about nonpoint pollution and farming practices; increase understanding of the relationship between water quality and increasing development; and consider the economics and informational needs of local farmers.

C. Tribal Coastal Management.

During the site visit, a meeting was held with several of Washington's Tribal representatives. Among those attending were representatives of the Northwest Indian Fisheries Commission and the Lummi Indian Business Council. One of the issues discussed was whether or not a Tribe could develop its own coastal management program. Tribes are not identified as eligible coastal states under the CZMA. Rather, Tribes may receive a portion of the state's CZMA funding, as areawide agencies, to implement a portion of the state's coastal management program. To be eligible for a portion of the state's coastal zone management funds for those tribal lands identified as "excluded Federal lands" in the WCZMP, the state must demonstrate that a tribal program or project would or could directly affect the state's coastal zone.

In 1994 President Clinton directed all government agencies to recognize the unique government-to-government relationship that exists between American Indian tribes and the Federal government. This relationship is based on treaties that were established with tribes in exchange for their land. Likewise, the Department of Commerce has a departmental policy in recognition of this legal, government-to-government relationship.

The CZMA specifically defines those entities which may develop coastal management programs. Thus the Northern Mariana Islands, Guam, American Samoa, Puerto Rico and the Virgin Islands as well as the thirty (30) coastal states are specifically mentioned for the development of coastal management programs. In the coming months, OCRM will continue to examine how to facilitate Tribal coastal management efforts.

D. Federal Consistency.

Federal agency activities that affect coastal zone land uses, water uses, or natural resources must be consistent to the maximum extent practicable with the WCZMP. Applicants for Federal permits, grants, and loans also may need to comply with the Federal CZMA consistency requirements. Washington residents, local governments, State agencies, and Indian tribes may use the consistency review process to inform Federal agencies of their views. The Department of Ecology is the lead agency to carry out the State consistency review responsibilities under the CZMA. Performance reports indicate that Ecology is carrying out the consistency review process as required. Meetings with Federal agencies during the site review indicates that federal consistency is understood.

In the 1990 reauthorization of the CZMA, new public participation requirements were placed on the States under section 306(d)(14). OCRM provide draft guidance on November 4, 1993 and published final guidance on June 13, 1994. The states had one year to comply with the final guidance. Ecology has yet to send in documentation that Washington has complied with the requirements to provide public participation in permitting decisions, consistency determination, and other similar decisions.

NECESSARY ACTION:

1) Within four (4) months of the receipt of these final findings, Washington will inform OCRM of how it will address the new public notice requirements at 306(d)(14) of the CZMA, consistent with NOAA's guidance.

E. Program Document.

The previous evaluation of the WCZMP cited the draft revisions to the WCZMP program document as both an accomplishment and a necessary action. The program document accomplishment read:

During the review period, Shorelands launched a comprehensive revision of the original WCZMP program document. The draft program document revision, when complete, will be a significant improvement of value to Shorelands, OCRM, other agencies and the public.

The necessary action read:

Mid-term. Shorelands has already completed comprehensive drafts of a revised Washington Coastal Zone Management Program document. Subsequent to the 1995 state legislative session, Shorelands must revise and complete the document to reflect changes to authorities and organization. The revised document should describe the new Shorelands organization and update other programs, policies, and authorities included in the WCZMP. These changes should also address the program approval criteria found at section 306 of the Coastal Zone Management Act of 1972, as amended.

Ecology has put a great deal of effort into revising the draft program document that has been reviewed and commented on by OCRM. The need for continual revisions is due in part to changes in legislation during the intervening time, specifically the GMA, changes to the SMA and SEPA. Ecology is working in good faith to meet the intent of the previous evaluation finding but has been pressed to meet State commitments regarding the SMA, GMA and SEPA integration. Current work efforts indicate that the State will be able to produce a draft document by the end of 1997, after the basic SMA and GMA elements are in place.

NECESSARY ACTION:

2) Ecology will submit a final draft document of the revised WCZMP for OCRM review and comment by the end of calendar year 1997.

F. SMA Permit Enforcement and Monitoring.

One of the pervading concerns during the site visit was the monitoring of the permit conditions and compliance with the approved local Shoreline Master Plans. The concern was not a loss of resources, but that opportunities are lost when a monitoring and enforcement program is not aggressively implemented. Essentially it was recognized that enforcement at the local level and at the state level is not aggressively pursued.

The responsibility for most site investigation and for negotiating and drafting enforcement orders and penalties was shifted to the regional offices in 1995. While the regionalization of Ecology has had an effect of placing technical support closer to local governments, it must be noted that Ecology has also experienced significant staff reductions, which has had an effect on total service delivery during the period. During the evaluation site visit, Ecology staff acknowledged that Shorelands enforcement has not had the emphasis it had in the past. This is because of several reasons: greater Ecology emphasis on resolving litigation concerning water rights issues; an increased workload at the regional level with less staff; and, an overall agency shift away from enforcement and toward prevention. These factors resulted in a significant reduction in human resources dedicated toward SMA enforcement. Of the three and one half (3½) coastal management full time equivalent positions assigned to enforcement, only one stated that time was spent on enforcement, and that being no more than 50% of the time.

This is not a new issue. The previous evaluation noted as a necessary action that:

Long Term: Shorelands must devise and implement a systematic monitoring and assessment program that assesses unpermitted activities statewide and determines the extent to which local governments are enforcing their SMPs. To maximize Ecology's limited staff and financial resources, the program should involve other state and federal agencies to the extent possible. Elements of the Joint Aquatic Permit Application process may provide a useful model for this approach.

Long Term: Shorelands must devote resources to enforcement sufficient to assist local governments in building monitoring and enforcement program (sic) and to process cases in a timely manner.

This was not fully accomplished, though regionalization was to have begun to address this issue. It is noted that in the performance report received in February 1996, covering the period from July through December 1995, Ecology noted "At the appropriate point in the future, the program will evaluate the regionalized enforcement effort in terms of consistency, workload priorities, and overall effectiveness. The program will make adjustments as needed."

The primary duty to monitor and enforce the SMA is statutorily vested with local governments and the regionalization was to enhance relations with local governments through more prompt investigations, deeper knowledge and a smaller geographic scope of duties. The

enforcement manual, Enforcing the Shoreline Management Act, (see IV. Program Accomplishments, F. Enforcement Manual) is a significant programmatic achievement in supporting local efforts. However, as with SMA enforcement, State efforts in monitoring compliance with permit conditions and for illegal actions, should be improved. With little staff devoted to enforcement, less staff is devoted to monitoring for compliance.

Again, this is not a new issue and was mentioned in the necessary action of the previous evaluation related to monitoring and enforcement. The enforcement manual was a first step in meeting this necessary action, but the action has yet to be fully met.

Indicative of the need for a monitoring process is a desire for local governments to have some procedure to check permit compliance over the long term. One local planner noted the instance where a condition to a permit requiring that a marina developer provide legitimate public access was not being met. At the time of the permit and construction public access was provided. However, over time, notice of public access was removed. The condition required the landowner to maintain public access to significant State resources while allowing himself full use of property. The result was that, over time, public use was thwarted. At issue is the loss of knowledge regarding the public's right to access to the shoreline. As local officials change, local knowledge of permit conditions is lost. A long term mechanism would support local monitoring by providing a tool for the regional offices in supporting local efforts.

Another indication of the need for some form of monitoring was the general lack of understanding about how effectively the SMA is being implemented evidenced during the evaluation site visit. No indication could be provided regarding the effectiveness of implementation over the three year period of this review. Given the results of this review, the lack of staff designated to, and actually carrying out enforcement activities, the "appropriate point in the future" spoken of in Ecology's response to the previous evaluation, is now.

NECESSARY ACTION:

3) Ecology must develop a compliance and enforcement strategy to assure that the WCZMP is being implemented in such a way that the policies of the CZMA are being met. The strategy will be completed by December 31, 1998. In the interim, Ecology will include summaries of compliance and enforcement activities in their routine semi-annual reports.

G) Shoreline Management Act/Growth Management Act Integration.

The procedural changes required under the GMA are discussed in IV. Program Accomplishments, C. Growth Management/Shoreline Management Integration. Recent regulatory reform legislation brought significant changes to the SMA and required the integration of SMA, the GMA and SEPA activities. Ecology is in the process of completing revisions to the substantive SMA guidelines which will drive the integration process. Some people interviewed on the site visit expressed concern regarding which statute should have control in implementation, suggesting that the GMA requirements might be less stringent than the SMA requirements.

Discussions with State officials indicated that this would not be the case. Representatives of both the Department of Community Trade and Economic development (who is charged with the implementation of the GMA) and Ecology indicated that the policies of the Shoreline Management Act would not be subservient to the GMA. The SMA will drive incorporation of the GMA, which must accommodate and be consistent with the shoreline master plans.

PROGRAM SUGGESTION

4) Ecology should complete the revisions to the SMA rules and assure that integration of the SMA achieves improvements to the local shoreline master plans.

H) Bulkheading of Single Family Lots.

Bulkheads for single family residential developments do not require a permit under the SMA, however they must meet requirements in the local shoreline master program. Local governments have developed various means of regulating bulkheads with varying degrees of success. The result is that a large amount of Puget Sound has been artificially "hardened."

This was noted in a number of discussions with the site visit review team. Tribes noted their concern with the impacts related to tribal fishing waters and to erosion downstream and at the river mouths. This issue was also raised by local and state officials who were concerned with the results of downstream erosion, loss of sediment deposit and loss of nearshore habitat.

Ecology received a section 309 award under the CZMA to complete a comprehensive, four-year Coastal Erosion Management Study (CEMS). The study tasks included research, impact analysis and policy analysis. Ecology completed the following tasks and studies:

- Inventoried and characterized the shoreline armoring of Thurston County, WA and determined that approximately one third of the county's marine shoreline is armored. The amount of armored shoreline about doubled between 1977 and 1993. In recent years about two-thirds of the permits issued for armoring were for repair or replacement of armoring projects.

-Reports on engineering and geotechnical techniques for shoreline protection of Puget Sound that provided the basis (in part) for guidance recommendations to local government and land owners for erosion protection.

-Study reports on the physical and ecological effects of armoring found that the primary impact of shoreline armoring on the physical coastal processes in Puget Sound is the prevention of sediments from reaching the beach.

-A report that evaluated regulatory and non-regulatory approaches to coastal erosion management and assessed policy alternatives. This report provided the basis (in part) for State guidance to local governments adopting of erosion management procedures.

-A report assessing the direct effects of shoreline armoring, and the secondary effects of changes to coastal processes and conditions upon biological resources.

-A comprehensive assessment of engineering, geotechnical, bioengineering, and vegetation management techniques for slope stabilization which provided the basis (in part) for development of guidance to local government and land owners.

-A report indicating that many "soft" approaches to erosion management (e.g., beach nourishment) or mitigation for adverse effects must be carried out on a regional basis to be effective. Both the technical and political feasibility of regional erosion management was assessed.

Information on shoreline erosion techniques has been included in the first draft of the amended rules for preparing shoreline master programs, released in August 1996. Final adoption is now scheduled for June 1997. Once the rules are adopted, the Shoreline Management Guidebook for development and implementation of local SMPs will be amended, providing detailed guidance for permitting shoreline erosion control where warranted, providing for mitigation, and land use measures to obviate the need for erosion control.

PROGRAM SUGGESTION

5) The WCZMP should continue to address the cumulative impacts of hardened shorelines in Puget Sound. More specific management policies and technical assistance documents which addresses these impacts should be considered.

I) Pacific Coast Shoreline Erosion.

Erosion events are increasing from Cape Disappointment at the mouth of the Columbia

River north to Conner Creek near Copalis Beach, resulting in significant impacts upon coastal dwellings and infrastructure. Recently there has been significant changes to shoreline accretion/erosion patterns. In Ocean Shores, changes in coastal dynamic and recent storms have eroded the coastal frontage threatening several recent, poorly sited waterfront condominiums. To the south of Ocean Shores, across the mouth of Grays Harbor, over \$8 million has been spent to fill a breach between the beach and south jetty at Westport. All indications are that all the funds spent to date may not solve the Westport jetty problem. Further south in Pacific County, local officials granted an SMA exemption allowing complete removal of the foredune to improve sight lines to the ocean.

To address the need to better understand these coastal processes, a cooperative Federal-State-local research project was begun in the summer of 1996. The goal of this project is to provide better scientific understanding of what is occurring in nearshore waters that is leading to the erosion problems currently being experienced. The project will require five years of detailed monitoring and analysis before recommendations will be made. This is a significant endeavor which should receive ongoing support despite the concurrent need for more immediate action. Using funding from the U.S. Geological Survey and USF&WS, Washington has begun the Southwest Coastal Erosion study to address nearshore coastal dynamics and their impact upon erosion in the lower coast. The study is of significant interest to a number of coastal communities where properties are threatened by erosion.

Management strategies for beach and dune management should not be put off pending the completion and potential outcome of this study. There is a large body of knowledge regarding methods and risks of building in coastal areas. Management resolutions should be evaluated and appropriate management strategies (such as establishing a construction setback or requiring construction standards which would allow for structural retreat in the event of erosion; acquiring and maintaining available data; or improving education and outreach to local officials and the public) be put into action as soon as possible. To this end, it may be desirable to convene other state and local government officials from the coastal community with knowledge and expertise in similar situations to explore potential solutions.

PROGRAM SUGGESTION

6) Ecology is encouraged to complete the Southwest Coastal Erosion study with the USGS. In addition, Ecology should work with OCRM to look for ways to improve the management decisions in the southern Washington shoreline area. Likewise, OCRM should work with Ecology to define needs for improved federal agency coordination in support of the needs of the local communities affected by erosion along the southwest Washington coast.

J) Updating of the Grays Harbor Estuary Management Plan.

During the initial implementation of the WCZMP a great deal of time and money was directed to the development of the Grays Harbor Estuary Management Plan (GHEMP). Carried out in part as a national model for special area management planning effort, it also represented a comprehensive effort for the Grays Harbor area. Adopted in 1986, the plan has guided local and State decisionmaking since plan approval.

Recently, the WCZMP passed through funds to the Grays Harbor Regional Planning Commission (GHRPC) to revisit the GHEMP and assess the content relative to changed conditions of ten years from plan approval and more than twenty years since plan inception. To this end, the GHRPC intends to convene a working group during the first quarter of the 1997 calendar year. OCRM supports revisitation and assessment of the effectiveness of the implementation of the GHEMP. Proposals to revise the Plan must be cost effective, given the drastic reduction in state and federal staff and resources to address coastal issues in Washington

PROGRAM SUGGESTION

7) While revisitation and assessment of the effectiveness of the implementation of the Grays Harbor Estuary Management Plan is encouraged, a lengthy planning process, and its resultant costs, should be avoided.

K) Training of Public Officials.

The WCZMP has a long history of accomplishments in providing technical assistance, training and outreach. These efforts have targeted interested citizens, local government officials and staff. Many local appointed planning directors and staff praised Ecology's efforts. However, virtually no technical support is directed at the large group of locally elected officials. This group changes with regularity, and the appointed officials (to Boards and Commissions) often change as new individuals take on the responsibility of office. Given their role in the SMA process, it is important that elected officials fully understand their responsibilities under the SMA and the rationale for why shoreline management is important.

PROGRAM SUGGESTION

8) Ecology should provide technical assistance for locally elected officials which provides the rationale and support for the implementation of local management programs and the SMA.

L) Shorelands/Coastal Management Program Identity.

One of the downsides resulting from regionalization and integration of Shorelands and Water Resources staff is the loss of a coastal identity among the staff in headquarters and the regional offices. While on one side there is increased coordination among the different elements of Ecology at the regional level, and the Department as a whole enjoys positive local relationships as a result of regionalization, some of the unique attributes of the coastal program are being lost. In addition, the regionalization has resulted in a potential decrease of State consistency in the policy focus of the WCZMP due to a lack of interaction between the regions.

Regional staff noted a lack of coordination between the regions - they "don't know what is happening" outside their region and they don't often take the time to become aware of what is happening. There are many potential results from the loss of communication in the work place. One regional staff person noted a reluctance to place certain conditions on permits because there is no information whether the condition is similarly applied in other coastal areas.

The wetlands staff within Shorelands has continued monthly, day-long meetings since regionalization began. This has allowed them to discuss issues of mutual concern and to maintain informal networks for ongoing communication. A similar situation did not evolve for Shorelands personnel who work on other issues. Recognizing this, headquarters has instituted joint meetings for all coastal staff. These short duration meetings are a step in the right direction.

PROGRAM SUGGESTION

9) Ecology should consider ways for all Shorelands staff, in order to improve communication and devise a means to ensure coordination of information and approaches among Shorelands regional and headquarter staff. This could include an annual or biannual one to two day workshop involving relevant staff from other State agencies. The workshop should result in a means to foster follow-up communication throughout the remainder of the year.

M) Documentation of Shorelands Program Accomplishments.

Since the beginning of WCZMP implementation, the citizens of Washington have been provided with a strong, yet flexible State management program that addresses coastal management needs within a local context. The Shorelands Program has continued to maintain the same high professional standards of the past, despite significant reduction in resources and political challenges. The result is a significant number of accomplishments. Except for the 306A document (See Section IV. Program Accomplishments, E.) Ecology has not enumerated these accomplishments in one document, thus preventing a concise listing of accomplishments. This is unfortunate because the accomplishments, as a whole, are an indication of solid

professional performance and a wise expenditure of State and Federal funds.

PROGRAM SUGGESTION

10) Ecology should consider developing various means of documenting the overall accomplishments of WCZMP implementation over the recent past, how the State has benefited from the program, and the economic advantages accruing from the wise management practices carried out to implement WCZMP policies and goals. Alternative means could be enhancing existing documents such as the "Confluence" newsletter of a separate annual report.

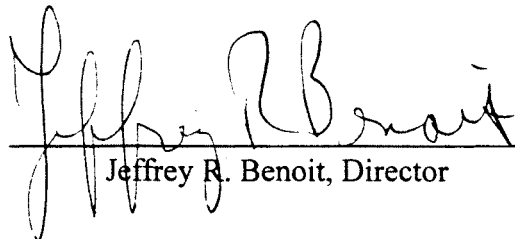
VI. CONCLUSION

Based on OCRM's review of the federally approved Washington Coastal Zone Management Program and the criteria at 15 CFR 923.135(a)(3) [formerly 15 CFR 928.5(a)(3)], I find that the State of Washington is adhering to its federally approved coastal management program. Further advances in coastal management implementation will occur as the State addresses the program recommendations contained herein.

These evaluation findings contain 10 recommendations, three (3) of which take the form of Necessary Actions and are mandatory, and seven (7) of which are Program Suggestions that the State should address before the next regularly scheduled program evaluation, but which are not mandatory at this time. (These recommendations are tabulated in Appendix F.) Program suggestions that OCRM must repeat in subsequent evaluations, however, may be elevated to necessary actions (which must be acted upon within specific time frames or financial assistance may be jeopardized).

This is a programmatic evaluation of the WCZMP that may have implications regarding the State's financial assistance award(s). However, it does not make any judgements on, or replace any financial audit(s) related to, the allocability of any costs incurred.

4/10/97
Date


Jeffrey R. Benoit, Director

WASHINGTON COASTAL MANAGEMENT PROGRAM 312 EVALUATION

PERSONS CONTACTED DURING THE EVALUATION

Department of Ecology

Linda Crerar	Assistant Director, Water and Shorelands
Carol Fleskes	Shorelands and Water Resources Program Manager
Tom Mark	Shorelands Headquarter staff
Ben Bonkowski	Water Division
Ramsey Radwan	Water Division
Aaron Purcell	Water Division
Cheryl Strange	Water Division
Andy McMillan	Shorelands Headquarters staff
Dick Gersib	Shorelands Headquarters staff
Jane Rubey	Shorelands Headquarter staff
Bonnie Shorin	Central Program staff
Doug Canning	Shorelands Headquarter staff
Jim Anest	Shorelands Headquarter staff
George Kaminsky	Shorelands Headquarter staff
Chuck Gale	Water Division
Steve Craig	SWRO
Brian Lynn	Shorelands Headquarters staff
Therese Swanson	Shorelands Headquarters staff
Peter Skowlund	Shorelands Headquarters staff
Gail Blomstrom	Southwest Regional Office (SWRO) Manager
Kim VanZwalenburg	SWRO
Mark Bentley	SWRO
Randy Davis	SWRO
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Bill Leonard	SWRO
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Jeffrey Stewart	SWRO
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Dan Sokol	SWRO
Bill Young	SWRO
Hugh Shipman	Shorelands Headquarters staff
Ray Hellwig	Northwest Regional Office (NWRO) Manager
Alice Schisel	NWRO

Shoreline Hearings Board

Richard C. Kelley	Director
Bob Jenson	Shorelines Hearings Board
Judy Wilson	Shorelines Hearings Board

Department of Community, Trade and Economic Development

Steve Wells	Assistant Director
Chris Parsons	Growth Management Planner

Department of Natural Resources

Lee Stilson

Interagency Committee for Outdoor Recreation

Jim Fox

Puget Sound Water Action Team

Steve Tilley

Tribes

Fran Wilshusen	Water Resources Coordinator, Northwest Indian Fisheries Commission
Harriet Beale	Water Resources Manager, Lummi Indian Business Council
Jim Park	Skokomish Tribe

Federal Agencies

Alan Mearns	National Marine Fisheries Service (NMFS)
Dave McKinnie	National Ocean Service
Tom Mueller	U.S. Army Corps of Engineers (COE)
Karen Northrop	COE
Judith Leckrone	Environmental Protection Agency

Environmental Groups

Toby Thaler	Washington Environmental Council
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Scott Merriman	Washington Environmental Council
Kathie Fletcher	People for Puget Sound
David Ortman	Friends of the Earth
Roberta Gunn	Puget Soundkeeper Alliance
Chrys Bertolotto	Adopt a Beach
Ann Aagaard	League of Women Voters
Christi Norman	Wet Net
Bruce Fortune	American Littoral Society
Joan Crooks	Washington Environmental Council
Betty Tabbutt	Washington Enviroenemtal Council
Bruce Wishart	Sierra Club
Jacques White	People for Puget Sound
Fred Felleman	Ocean Action

Others

Rebecca Chaffee	City of Raymond Department of Planning
Fred Chapman	Public Works Director, City of Westport
Bill Banks	Executive Director, Grays Harbor RPC
Dennis LeFevre	Senior Planner, Grays Harbor RPC
Michael Pence	City Manager, City of Ocean Shores
Bob King	Planner, City of Ocean Shores
Eric D. Johnson	Environmental Affairs Director, Washington Public Ports
Mary Dodsworth	Recreation Director, Town of Steilacoom
Lois Starks	Planner, Town of Steilacoom

**Washington Coastal Zone Management Program
312 EVALUATION**

PERSONS ATTENDING THE PUBLIC MEETING

The Public Meeting was held on November 21, 1996, at 7:00 pm, at the Department of Ecology, 300 Desmond Drive, Olympia.

Persons Attending the Public Meeting

Fred Felleman*	Conservation Biologist, Ocean Action
David Ortman*	Friends of the Earth
Kerrey Engaul*	Brady's Oysters, Grays Harbor
Cindy Moore	Department of Agriculture
Janie Civile	Department of Natural Resources
Arthur Greenbaum*	Greys Harbor
Linda Orgel*	Greys Harbor
Ron Schultz*	National Audubon
Bruce Fortune*	American Littoral Society

* Commented at the Public Meeting.

**Washington Coastal Zone Management Program
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WRITTEN COMMENT RECEIVED AND RESPONSE

Ron D. Shultz

Policy Director

Washington State Office

National Audubon Society

November 21, 1996

Notes CZM staffing at 60% of staffing levels of previous years and recognizes that the agency has worked hard to "continue effective oversight and protection" of shorelines and wetlands.

Concern: Budget constraints, some legislative efforts to weaken environmental protections, and local jurisdictional efforts related to growth management create a greater need for strong oversight.

Response: These issues are addressed in Section V. Review Findings and Recommendations at F. SMA Permit Monitoring and Enforcement and G. Shoreline Management Act/Growth Management Act Integration.

Concern: Integration of the SMA and GMA. Process has not provided adequate public participation and not considered the views of interested groups. Crux of the issue is the potential for GMA implementation to lessen shoreline management controls. Funding should be tied to this.

Response: This issue is addressed in Section V. Review Findings and Recommendations at G. Shoreline Management Act/Growth Management Act Integration.

Concern: Ecology implementation of functional assessment technology in defining wetlands. Views the technology as unnecessarily expensive when cheaper adequate alternatives exist. Also, the classification system should be a stand alone document rather than one which refers to other documents. Ecology should move to a functional characterization system rather than a simple classification system.

Response: This is under review at Ecology.

Chuck Gurrard

Mayor

City of Aberdeen

November 14, 1996

Discusses the partnership which exists between the City and Ecology and its significance in education, local government relations, research, wetland protection and shoreline management.

Response: None required.

Carol Brown

Environmental Coordinator

local Elwha Tribal Council

November 18, 1996

Concern: The exclusion of Tribes from the Federal coastal zone management funding process.

Response: This issue is discussed in Section V. Review Findings and Recommendations at C. Tribal Coastal Management.

David Ortman

Executive Director

Northwest Office

Friends of the Earth

4512 University Way, N.E.

Seattle, Washington

December 18, 1996

In the report submitted by Mr. Ortman, OCRM is requested to "withdraw financial approval of the management program and withdraw any financial assistance available to the state." Likewise, OCRM is requested to specifically reference and respond to their comments as a part of the Section 312 Evaluation Findings.

Concern: The "approval of the WACZMP on behalf of the Secretary of Commerce remains faulty."

Response: The purpose of a Section 312 Evaluation is not to review the Secretary's approval decision. The CZMA requires the periodic review of approved programs. This evaluation focused on the implementation of the WCZMP and Ecology's

adherence to the terms and conditions of the NOAA financial assistance awards the WCZMP received between December 1993 through November 1996.

Concern: The Department of Ecology failed “to provide public notice and what public notice they did provide did not indicate a correct deadline for submitting written comments,” and “failed to identify the material which is available from OOCRМ, nor did they indicate that the Sec. 306 grant applications were available for public review.”

Response: Ecology provided public notice of the public meeting of the evaluation forty five (45) days in advance of the meeting, as required by the CZMA. This is the only required public notice of a state. The required Federal Register notice was several days late. This notice is the requirement of OCRM. However, it is noted that the commentor, as well as a large number of other parties, was contacted well in advance of the site visit by NOAA staff and, as a result of the late notice within the Federal Register, additional comment time was allowed.

Concern: Lack of action regarding U.S. Army Corps of Engineers issuance of nationwide permits for wetland filling under Section 404(e) of the Clean Water Act and that the “Corps continues to issue nationwide permits for wetland filling despite the State of Washington’s denial of water quality certification for certain...permits.”

Response: Recent actions by the COE indicate that a decision was made to phase out the nationwide permit in question, rendering this issue moot.

Concern: Oppose OOCRМ waiting three years to evaluate state coastal zone programs.

Response: Three years is an adequate time frame for routine reviews. More frequent reviews may be conducted on a case by case basis.

Concern: Quarterly reports are “too general and do not provide quantitative information that would allow either the public or OOCRМ to track coastal improvements from year to year.”

Response: OCRM, working with the states, is in the process of developing a standardized process for cooperative agreement application and reporting. This process will provide the information to OCRM necessary to manage financial assistance awards, support the program evaluation process, and provide the underpinning of a national data base on coastal management activities. These, when developed will be available to the public through internet access.

Concern: DOE allows a “proliferation of environmental designations by local governments in their shoreline master programs.”

Response: The WCZMP provides for local government implementation with oversight of shoreline master program through State and OCRM approval.

Concern: Lack of recent data on public access, the most recent being 1985.

Response: Ecology indicated that as staff time is available, the public access data will be updated.

Concern: Ecology's test burn of 10,000 gallons of oil off the Washington Coast.

Response: This was an activity which was intended to support environmental protection. Ecology halted the plans to conduct the test and is now completing an EIS for the test burn.

Concern: A failure by Ecology to "promote or actively support...the removal of two private dams to restore fish runs" in the Elwha River.

Response: The Elwha River is the subject of ongoing planning and study. Likewise, the creation or restoration of fish runs is a State priority.

Concern: The impact of the increase in U.S. Navy presence in Washington.

Response: Decisions of the U.S. Navy regarding the deployment of personnel and material are under public notice, review and comment.

Concern: That little WCMP funding has been directed to animal confinement operations which result in nonpoint source pollution.

Response: This issue is addressed through the watershed planning process being carried out by the State.

Washington Coastal Zone Management Program 312 EVALUATION

RESPONSE TO PREVIOUS FINDINGS

1) Necessary Action: Mid-term. Shorelands has already completed comprehensive drafts of a revised Washington Coastal Zone Management Program document. Subsequent to the 1995 state legislative session, Shorelands must revise and complete the document to reflect changes to authorities and organization. The revised document should describe the new Shorelands organization and update other programs, policies, and authorities included in the WCZMP. These changes should also address the program approval criteria found at section 306 of the Coastal Zone Management Act of 1972, as amended.

The document should also address the issues raised in these findings follows:

- How the new Shorelands organization will maintain the same level of coastal management as the structure it replaces;
- How the coastal management priorities Shorelands selects to guide its operations are consistent with and advance the CZMA, SMA, and other relevant statutes;
- What mechanisms will ensure the WCZMP is implemented consistently in the regions;
- How the public and local government will be able to participate in Shorelands' ongoing priority development and goal setting; and
- What ongoing assessment process will ensure Shorelands' reorganization meets its coastal management goals.

Program Suggestion: Shorelands should consider establishing an advisory group composed of local shoreline master program administrators, and other affected parties to evaluate Shorelands reorganization efforts to date and to consider refinements of Shorelands' management priorities that may take place in the future.

STATE RESPONSE: The State response to the necessary action is discussed in V. Review Findings and Recommendations, E. Program Document. This discussion requires the State to meet the intent of the previous necessary action by the end of calendar year 1997 and takes the form of a necessary action. The state considered, but did not establish the advisory group suggested in the second part of the recommendation.

2. Necessary Action: Short Term: Ecology must develop and implement a program to review and assess local shoreline master programs on a regular basis to assess their effectiveness in meeting the SMA's goals and determine how well local governments implement their SMPs. Based on this review, Ecology should recommend improvements to individual local governments. The review should include an assessment of the adequacy of local policy and technical procedures.

Program Suggestion: Shorelands should develop an evaluation process to correlate the results of the reviews of local SMPs and progress toward meeting statewide goals for coastal management.

Ecology should seek legislative authority to require periodic updates of SMPs.

STATE RESPONSE: This is addressed in Section V. Review Findings and Recommendations at F. SMA Permitting and Monitoring.

3. Necessary Action: Short Term. Shorelands must provide OCRM with a schedule for submitting all of the SMP amendments it has approved, but has not submitted to OCRM as program changes. The schedule must be designed to ensure the existing backlog of SMP amendments is submitted over the next two years and that all new amendments are submitted to OCRM on a regular basis.

Midterm: With (sic) two years, Shorelands must have submitted all of the backlogged SMP amendments to OCRM for consideration as program changes.

STATE RESPONSE: This is discussed in Section IV. Program Accomplishments at J. Routine Program Changes.

4. Necessary Action: Long Term: Shorelands must devise and implement a systematic monitoring and assessment program that assesses unpermitted activities statewide and determines the extent to which local governments are enforcing their SMPs. To maximize Ecology's limited staff and financial resources, the program should involve other state and federal agencies to the extent possible. Elements of the Joint Aquatic Permit Application process may provide a useful model for this approach.

Long Term: Shorelands must devote resources to enforcement sufficient to assist local governments in building monitoring and enforcement (sic) program and to process cases in a timely manner.

STATE RESPONSE: This is discussed in V. Findings and Recommendations, F. SMA Permitting and Monitoring.

WASHINGTON COASTAL ZONE MANAGEMENT PROGRAM
312 EVALUATION

DOCUMENTS REVIEWED

- Canning, Douglas J. Coastal Zone Assessment: An Annotated Bibliography of the Documentary Literature. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. December 1995.
- Moore, Danna and Mary Bounton. Survey of Washington households on the Shoreline Management Act and Related Shoreline Issues. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. July 1996.
- Hruby, Thomas, et.al. Guidelines for Developing Freshwater Wetlands Mitigation Plans and Proposals. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. March 1994.
- Granger, Teri, et.al. Washington State Wetland Function Assessment Project: An Approach to Developing Methods to Assess the Performance of Washington's Wetlands. DRAFT Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. June 1996.
- Washington Department of Ecology. Managing Our Shores: Ten Years of Local Coastal Zone Management Projects in Washington State 1984 - 1994. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. Undated.
- City of Raymond. Raymond Waterfront Redevelopment Plan. City of Raymond, Washington. June 1994.
- Washington Department of Ecology. Washington's Environmental Health 1995 A Summary of Environmental Indicators. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. 1995.
- Claremont Technology Group and Ross & Associates. Information Strategy Plan Final Report. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. June 1995.
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Assisting Washington Landowners. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington.

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Myers Biodynamics, Inc., et.al. Surface Water and Groundwater Effects on Coastal Bluffs. A Guide for Puget Sound Property Owners. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. 1995.

Huckell/Weinman Associates, Inc. Enforcing the Shoreline Management Act, Guidance for Local Government Administrators. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. 1995.

Hruby, Thomas, et.al. Methods for Integrating Data and Characterizing Wetland Functions Using GIS in Washington State. Shorelands and Water Resources Program, Washington Department of Ecology, Olympia, Washington. 1996.

WASHINGTON COASTAL ZONE MANAGEMENT PROGRAM 312 EVALUATION

Table of Recommendations

Number/Type of Recommendation		Recommendation Text	Required Date
Number	1	Within four (4) months of the receipt of these final findings, Washington will inform OCRM of how it will address the new public notice requirements at 306(d)(14) of the CZMA, consistent with NOAA's guidance.	
Necessary Action	X		
Program Suggestion			
Number	2	Ecology will submit a final draft document of the revised WCZMP for OCRM review and comment by the end of calendar year 1997.	
Necessary Action	X		
Program Suggestion			
Number	3	Ecology must develop a compliance and enforcement strategy to assure that the WCZMP is being implemented in such a way that the policies of the CZMA are being met. The strategy will be completed by December 31, 1998. In the interim, Ecology will include summaries of compliance and enforcement activities in their routine semi-annual reports.	12/31/98
Necessary Action	X		
Program Suggestion			
Number	4	Ecology should complete the revisions to the SMA rules and assure that integration of the SMA achieves improvements to the local shoreline master plans.	
Necessary Action			
Program Suggestion	X		
Number	5	The WCZMP should continue to address the cumulative impacts of hardened shorelines in Puget Sound. More specific management policies and technical assistance documents which address these impacts should be considered.	
Necessary Action			
Program Suggestion	X		

Number	6	Ecology is encouraged to complete the Southwest Coastal Erosion study with the USGS. In addition, Ecology should work with OCRM to look for ways to improve the management decisions in the southern Washington shoreline area. Likewise, OCRM should work with Ecology to define needs for improved federal agency coordination in support of the needs of the local communities affected by erosion along the southwest Washington coast.	
Necessary Action			
Program Suggestion	X		
Number	7	While revisitation and assessment of the effectiveness of the implementation of the Grays Harbor Estuary Management Plan is encouraged, a lengthy planning process, and its resultant costs, should be avoided.	
Necessary Action			
Program Suggestion	X		
Number	8	Ecology should provide technical assistance for locally elected officials which provides the rationale and support for the implementation of local management programs and the SMA.	
Necessary Action			
Program Suggestion	X		
Number	9	Ecology should consider ways for all Shorelands staff, in order to improve communication and devise a means to ensure coordination of information and approaches among Shorelands regional and headquarter staff. This could include an annual or biannual one to two day workshop involving relevant staff from other State agencies: The workshop should result in a means to foster follow-up communication throughout the remainder of the year.	
Necessary Action			
Program Suggestion	X		
Number	10	Ecology should consider developing various means of documenting the overall accomplishments of WCZMP implementation over the recent past, how the State has benefited from the program, and the economic advantages accruing from the wise management practices carried out to implement WCZMP policies and goals. Alternative means could be enhancing existing documents such as the "Confluence" newsletter of a separate annual report.	
Necessary Action			
Program Suggestion	X		